

MORROW

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,) Cr. No.: 1:23-cr-10053-STA
v.) 18 U.S.C. § 2252(a)(4)(B)
THEODORE JOSEPH DESCHLER,) 18 U.S.C. § 2253
Defendant.)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

(Possession of Child Pornography)

On or about July 22, 2021, in the Western District of Tennessee, the defendant,

----- **THEODORE JOSEPH DESCHLER** -----

knowingly possessed a digital storage device, specifically, a silver HP laptop computer, which then contained visual depictions of minors engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2)(A), including visual depictions involving prepubescent minors under 12 years of age engaged in sexually explicit conduct; the production of each visual depiction involved the use of a minor engaged in sexually explicit conduct, and each said visual depiction is of such conduct; and said visual depictions had been shipped and transported using a means and facility of interstate and foreign commerce, and the production of each said visual depiction involved the use of materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; all in

violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT 2

(Possession of Child Pornography)

On or about July 22, 2021, in the Western District of Tennessee, the defendant,

----- **THEODORE JOSEPH DESCHLER** -----

knowingly possessed a digital storage device, specifically, a Toshiba laptop computer (Serial No. 3D014763R), which then contained visual depictions of minors engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2)(A), including visual depictions involving prepubescent minors under 12 years of age engaged in sexually explicit conduct; the production of each visual depiction involved the use of a minor engaged in sexually explicit conduct, and each said visual depiction is of such conduct; and said visual depictions had been shipped and transported using a means and facility of interstate and foreign commerce, and the production of each said visual depiction involved the use of materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; all in violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF INTENT TO SEEK FORFEITURE

1. The allegations contained in Counts 1-2 of this Indictment are incorporated by reference as if fully set forth herein.
2. Upon being convicted of violating 18 U.S.C. § 2252, the defendant, **Theodore Joseph Deschler**, shall forfeit to the United States all rights, title, or interest he has in:
 - (a) any visual depiction described in 18 U.S.C. § 2252, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction which was produced, transported, mailed, shipped, or received in violation of that statute;
 - (b) any real or personal property constituting or traceable to gross profits of other proceeds obtained from the above offenses; and
 - (c) any real or personal property used or intended to be used to commit or to promote the commission of the above offenses, including, but not limited to, the following:
 - Silver HP laptop computer.
 - Toshiba laptop computer (Serial No. 3D014763R).

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

FOREPERSON

DATE

KEVIN G. RITZ
UNITED STATES ATTORNEY

HILLARY LAWLER PARHAM
ASSISTANT UNITED STATES ATTORNEY